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REMARKS**I. Introduction**

In response to the Office Action dated April 7, 2004, claims 1, 8, 14, 21, 27, and 34 have been amended. Claims 1-39 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art Rejections

In paragraph (4) of the Office Action, claims 1, 2, 4, 9-15, 17, 22-28, 30, and 35-39 were rejected under 35 U.S.C. §102(e) as being anticipated by Beezer et al., U.S. Patent No. 6,597,314 (Beezer). In paragraph (5) of the Office Action, claims 3, 5-8, 16, 18-21, 29, and 31-34 were rejected under 35 U.S.C. §103(a) as being unpatentable over Beezer in view of Lim et al., U.S. Patent No. 6,434,619 (Lim).

Applicant respectfully traverses these rejections.

Specifically, independent claims 1 was rejected as follows:

With regard to claim 1:

As illustrated in Fig. 3, and as described (column 4, lines 55-63) Beezer discloses a computer-implemented 200 method for presenting a series of titles 310 (help source file) of a document to a user.

As per the step of "maintaining a help", the method of Beezer includes presenting (maintaining) a set of help topics or series of titles to be selected by a user (column 4, lines 55-63);

As per the step of "receiving request", the method of Beezer includes receiving a signal corresponding to a user request for the help and settings control document (column 9, lines 16-17 of claim 2).

As per the step of "obtaining a help", the method of Beezer includes determining (obtaining) the target part of the help and settings control document based on a navigational history associated with the user (column 6, lines 46-56, column 9, lines 6-10 of claim 1);

As per the step of "displaying", the method of Beezer further includes displaying a configured (customized) display of the help and settings control document (help source file) based on stored navigational history component 704 and user profile component 708 (column 7, lines 53- column 8, lines 22).

Independent claims 1, 14, and 27 were amended and now incorporate limitations of prior claims 8, 21, and 34 respectively. Claims 8, 21, and 34 were rejected as follows:

With regard to claims 8, 21, and 34:

Furthermore, while Beezer discloses a pointer, e.g., numerical value corresponding to the context a user navigates to (column 6, lines 4-column 7, lines 9), but Beezer fails to disclose the help history file to include a cookie. Lim also discloses a help document to include a cookie (see Lim, column 13, lines 18-26). At the time of the invention, it would have been obvious to a person of ordinary skill in the art to substitute the cookie of Lim for the pointer of Beezer because the help

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document will be able to identify the user and matches user's activity when a user logs for the second time (column 13, lines 3-26).

Therefore, it would have been obvious to combine Beezer with Lim to obtain the invention as specified in claims 8, 21 and 34.

Applicant respectfully traverses the above rejections for one or more of the following reasons:

- (1) Neither Beezer nor Lim teach, disclose or suggest a help history file that comprises a cookie;
- (2) Neither Beezer nor Lim teach, disclose or suggest storing an identification for each previously opened help file in a cookie; and
- (3) Neither Beezer nor Lim teach, disclose or suggest a help history file comprising a cookie wherein the cookie is generated locally by a client computer.

Independent claims 1, 14, and 27 are generally directed to displaying a customized presentation of one or more help files. Specifically, after receiving a request for a help file, a help history file is obtained. The help history file has a number of specific attributes. For example, the help history file stores information relating to a usage of the help system. To store this information, the help history file comprises a cookie and each time a help file is opened, an identification for the opened help file is stored in the cookie. Thus, the cookie stores the user's current location within a help system and a history of which help files the user has opened.

The cited references do not teach nor suggest these various elements of Applicant's independent claims.

Beezer merely describes a method and apparatus for providing user access to help and settings control in a system for viewing electronic books includes single document integrating help features and settings controls may be accessed in a single-window or single page viewing environment. The help and settings document may be accessed from a number of different contexts, including a library page or from within a book. "Smart" navigational features are provided for predicting a part, section or chapter of the help and settings document that is sought by a user based on navigational history and user profiles. Feedback as to the accuracy of predictions made by the "smart" navigation is also provided. However, Beezer lacks any discussion about cookies and identification for opened help files being stored in cookies. Instead, Beezer teaches away from Applicant's invention because it specifically describes the use of pointers to determine which part,

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section or chapter a user navigates to (see col. 7, lines 21-24). In fact, based Beezer's lack of teaching with respect to cookies, the Office Action relied on Lim to reject the prior dependent claims that referenced cookies.

Lim merely describes a system and method for the management of communication services from a service provider by a customer of the provider. The management system employs an Internet-based architecture that provides access to user's virtual private networks via an end user browser. The customer service management (CSM) system service director (SD) maintains a relational database for storing user specific information retrieved from the network manager. Based on an electronic search, the following provides the only description of cookies from Lim: Col. 4, lines 25-30 provide:

Each HTML page contains HTML, Java Script, and Java Applets. HTML is used to compose Web pages. Java Script is used for local client side processing (e.g. button actions, update time stamps, setting cookies.) Java Applets are used to provide more demanding Web interactions (e.g. displaying maps).

Col. 13, lines 3-8 provide:

Four functions are defined using Netscape Server API. The first function services the logon process. It checks the user Id and password against the list stored in the application. It sends out a JavaScript cookie to the client after the user Id and password are validated. The second function services the log out process.

Col. 13, lines 16-28 provide:

The fourth function will verify the JavaScript cookie to see if the server will go on to service the request at all.

FIG. 4 illustrates the flow of information between the client and server. The client sends a TCP/IP message containing user Id and password to the server. The IP address of the client is included in the TCP/IP message. If the client is authorized the server returns a welcome page together with a JavaScript cookie, which contains the user Id, to the client. The client browser matches the URL destination (domain) address to that of the cookie. It then sends the cookie together with the query to the server.

The JavaScript cookie expires at the end of the session i.e. logout or browser terminated.

As can be seen by these citations, Lim merely describes the use of a cookie as customarily used in the prior art. Such customary use is described at:

<http://www.techweb.com/encyclopedia/defineterm?term=cookie>. Namely, the cookie is generated by a server and sent to a client for storage on the client side. The cookie provides a way for a web server to identify a user and store the user's preferences. When a client browser connects to the server, the cookie may be sent to the server so that the server can customize the data/web page that is sent to the client web browser. Lim is merely consistent with this prior art concept. Namely,

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Lim's cookie stores a user ID generated by the server is the user's id and password are authorized/validated by the server (see col. 13, lines 4-6 and 21-24). Lim's cookie also expires at the end of each client-server session (see col. 13, lines 27-28).

Thus, as used in Lim, the cookie is merely used to validate a user through a userID and password. There is no suggestion, implicit or explicit, that the help history file is a cookie. Nor is there any teaching, description, suggestion, or implication that an identification for opened files are stored in a cookie. Again, rather than teaching the storage of an identification for files, Lim merely teaches the storage of a user ID in the cookie. Such a user identifier is not even remotely similar to the opened help file identifiers that are claimed.

In addition to the above, Applicant notes that the dependent claims further provide that the client computer generates the cookie locally (e.g., claim 8). Such a client generated cookie is completely contrary to that suggested in Lim. Lim is merely consistent with the prior art server side generation of a user ID (see Lim, Col. 13, lines 21-23).

Thus, in view of the above, Applicant submits that neither Lim nor Beezer teaches, describes, or suggests, either alone or in combination, the presently claimed invention. In fact, even when combined, the references would still fail to teach the invention as claimed. There is no description or suggestion in either reference to use cookies to store anything other than a user ID. In this regard, as described above, the amended claims specifically provide that the help history file comprises a cookie and each file that has been previously opened has a corresponding identification stored in the cookie. Neither reference even remotely alludes to such a teaching.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Beezer and Lim. In addition, Applicant's invention solves problems not recognized by Beezer and Lim.

Thus, Applicant submits that independent claims 1, 14, and 27 are allowable over Beezer and Lim. Further, dependent claims 2-13, 15-26, and 28-39 are submitted to be allowable over Beezer and Lim in the same manner, because they are dependent on independent claims 1, 14, and 27, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-13, 15-26, and 28-39 recite additional novel elements not shown by Beezer and Lim.

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III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: July 6, 2004

By: *Jason S. Feldmar*
Name: Jason S. Feldmar
Reg. No.: 39,187

JSF/sjm/mrj